



1 I, Hong-An Vu, declare as follows:

2       1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for  
 3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters  
 4 within my own personal knowledge and if called as a witness, I could and would competently  
 5 testify to the matters set forth herein. I make this declaration in support of Defendant Otto  
 6 Trucking’s Administrative Motion to File Under Seal Portions of its Response to Waymo’s Precis  
 7 (the “Response”).

8       2. I have reviewed the following documents and confirmed that only the portions  
 9 identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Response	Highlighted portions
Exhibit 2 to Vu Declaration	Highlighted portions
Exhibit 3 to Vu Declaration	Entire document
Exhibit 4 to Vu Declaration	Entire document
Exhibit 5 to Vu Declaration	Highlighted portions
Exhibit 6 to Vu Declaration	Entire document
Exhibit 8 to Vu Declaration	Highlighted portions

19       3. The above referenced documents and portions of documents contain information  
 20 designated by Plaintiff Waymo LLC as either Highly Confidential—Attorneys’ Eyes Only” or  
 21 “Confidential” under the terms of the parties’ protective order. Otto Trucking takes no position as  
 22 to the merits of the confidentiality designations in these documents.

23       4. Otto Trucking anticipates that Waymo will file a declaration in accordance with  
 24 Local Rule 79-5.

25       5. Otto Trucking’s request to seal is narrowly tailored to those portions of the  
 26 Response and its supporting documents that merit sealing.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed this 24th day of August, 2017 in Los Angeles, California.

3 /s/ Hong-An Vu  
4 Hong-An Vu  
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